UNITED STATES DISTRICT COURT

FILED

for the Eastern District of Missouri

MAR 2 2021

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In the Matter of the Search of Priority Mail parcel 9506 1150 7276 1056 5899 55 was addressed to addressed to "IKYA WILSON P.O. BOX 1510 FLORISSANT, MO 63031 and addressed from: "PREMIUM CLOTHING ETC. 16183 WINTERWOOD LN. FONTANA, CA 92335")	Case No. 4:21 MJ 7052 SP Signed and Submitted to the filing by reliable electronic FILED UNDER SEAL		EASTERN DISTRICT OF MO
AP	PLICATION FO	R A SEA	RCH WARRA	NT	
I, <u>Bryan J. Bussen</u> a search warrant and state under					
Priority Mail parcel 9506 115 1510 FLORISSANT, MO 630 LN. FONTANA, CA 92335"	31 and addressed from	m: "PREM	IIUM CLOTHING	ETC. 161	183 WINTERWOOD
located in theEAST	TERN District	t of	MISSOURI	, there	is now concealed
	Controlled Substances	and/or Un	ited States Currency	/	
✓ property designate of the property design	crime; ruits of crime, or other gned for use, intended to arrested or a person w	items illegator use, or use, or use.	ally possessed; used in committing		
The search is related to	a violation of:				
Code Section		Offense Description			
Title 21, U.S.C., §§ 846, 841(a)(1) The application is based on these facts:		Conspiracy to possess with intent to distribute controlled substance(s)			
The application is based	on these facts.				
SEE ATTACHED	AFFIDAVIT WHICH I	IS INCORP	ORATED HEREIN	BY REFE	RENCE.
☐ Delayed	ed on the attached sheet. notice of days (18 U.S.C. § 3103a, the b	(give exact basis of whi Br		attached sl	heet.
Sworn to, attested to, and affir Procedure 4.1 and 41 this Date:		iable electi March, 202			ral Rules of Criminal
City and State: St. Louis, N	10	Hone		nsah, U.S. me and title nan Wadal	

AFFIDAVIT

- I, Bryan J. Bussen, being duly sworn, state the following:
- 1. I am a Task Force Officer (TFO) with the United States Postal Inspection Service (USPIS). I have been assigned as a Task Force Officer with USPIS for approximately 3 months. I have been assigned to the Contraband Interdiction and Investigation (CI2) Team. I have completed available training by the USPIS in the investigation of controlled substances or proceeds/payments being transported through the United States. The St. Louis Field Office's CI2 Team has intercepted numerous parcels which were found to contain narcotics or proceeds of narcotics trafficking and other criminal activity. Prior to my assignment with the USPIS, I have accrued approximately 12 years of law enforcement experience. During my career, I have conducted numerous narcotics investigations as a Narcotics Detective with the Florissant Police Department. A position in which I have approximately 2 years of experience. While assigned as a Detective, I received extensive training in narcotics investigations.
- 2. Experience and drug trafficking intelligence information gathered by the USPIS have demonstrated that the U.S. Postal Service Express Mail and Priority Mail are frequently utilized by drug traffickers for shipping controlled substances or proceeds/payments. Use of Express Mail and Priority Mail are favored because of the speed (Express Mail overnight; Priority mail two day delivery), reliability, free telephone and internet package tracking service, as well as the perceived minimal chance of detection. Express Mail was originally intended for urgent, business-to-business, correspondence. Intelligence from prior packages, which were found to contain controlled substances or proceeds/payments, has indicated that these labels are usually from an individual to an individual. Express Mail and Priority Mail are seldom used for individual to individual correspondence.
- 3. Information gathered by the USPIS has also demonstrated that other delivery couriers, such as Federal Express and United Parcel Service, are frequently utilized by drug traffickers for shipping controlled substances or proceeds/payments. Information gathered by the USPIS has demonstrated that

the services and delivery practices of Federal Express and United Parcel Service are similar to U.S. Postal Service Express Mail and Priority Mail. Like U.S. Postal Service Express Mail and Priority Mail, Federal Express and United Parcel Service are favored because of the speed, reliability, free telephone and internet package tracking service, as well as the perceived minimal chance of detection. Like U.S. Postal Service Express Mail and Priority Mail, Federal Express and United Parcel Service were originally intended for urgent, business-to-business, correspondence. However, intelligence from prior packages which were found to contain controlled substances or proceeds/payments, has indicated that these shipping labels are usually from an individual to an individual. Federal Express and United Parcel Service are seldom utilized to convey individual-to-individual correspondence.

- 4. In an effort to combat the flow of controlled substances through the overnight or two to three day delivery services, interdiction programs have been established in cities throughout the United States by the USPIS. These cities have been identified as known sources of, and destinations for, controlled substances. The USPIS conducted an analysis of prior packages mailed through overnight and/or two to three day delivery services that contained controlled substances or proceeds/payments of controlled substance sales. The analysis of those prior packages indicated that these labels are usually from an individual to an individual. In the few cases when overnight, and or two to three day delivery service packages containing controlled substances or proceeds/payments have displayed a business or company name, it has usually proven to be a fictitious business or company, or the business listed is not associated with the mailer and was randomly selected by the mailer to deter law enforcement detection. In such instances, Postal Inspectors review available business records to verify the postage payment utilized by the mailer.
- 5. Most business mailings sent via USPS or through other private couriers reflect a preestablished postage meter or other various lines of credit to pay for the postage. Additionally, during the
 Silk Road investigation (dark web investigation that provided avenues to customers to order narcotics via
 the internet) the USPIS learned that unknown persons posted intelligence on the Silk Road website
 warning would be drug mailers that most USPIS search warrant affidavits for narcotics/narcotics proceeds

packages, reflect mailing labels written as person-to-person and bore fictitious addressee and sender names. Due to the posting on the Silk Road Website, USPIS has noticed an increased number of packages utilizing valid sender and addressee names and or valid business names on narcotics/narcotics proceeds packages. Recent analysis has also shown that whether the mailer utilized a legitimate name/business on a mailing label or a fictitious name on the mailing label, cash payment for postage is the method of payment for most narcotics/narcotics proceeds parcels. USPIS analysis has established a series of characteristics which, when found in combination of two or more, have shown a high probability that the package will contain a controlled substance or the proceeds of controlled substance sales. Information collected by the USPIS has demonstrated that the presence of these characteristics is significant for delivery services, to include U.S. Postal Service Express Mail, U.S. Postal Service Priority Mail, Federal Express, and United Parcel Service. This profile includes the following characteristics: package mailed from or addressed to a narcotic source city; package has a fictitious return address; package addressee name is unknown at the destination address; package sender name is unknown at the return address; package has address information which is handwritten; package is mailed from a Commercial Mail Receiving Agency (CMRA); package is addressed to residential areas; package is addressed from an individual to an individual; packages are wrapped in brown paper and/or heavily taped; and the ZIP Code from where the package is mailed is different than the ZIP Code used in the return address, and or any other characteristic previously noted in this paragraph.

- 6. The U.S. Postal Inspection Service St. Louis Field Office's CI2 Team has found the characteristics listed in paragraphs three, four, and five, are indicative of packages, which have been found to contain illegal controlled substances or the proceeds/payments for controlled substances.
- 7. This affidavit is submitted for the limited purpose of establishing probable cause for the search warrant sought. I have not set forth each and every fact known to me concerning this investigation. I have included what I believe are facts sufficient for the present purpose. The information contained in this affidavit is based upon my personal knowledge and investigation, as well as information conveyed to me by other law enforcement agents and employees.

- 8. On February 26th, this affiant conducted a review of postal business records, for inbound parcels to my area of responsibility, being north St Louis County. I located Priority Mail parcel 9506 1150 7276 1056 5899 55 (hereafter "Subject Parcel"). The Subject Parcel was mailed on February 25th, 2021 from the Fontana, CA post office. I noted the Subject Parcel had a printed label from a business; addressed to a person's PO Box; postage fees were \$26.90; and sent from a known source narcotic area: Fontana, CA. On February 27th, I responded to the St Louis National Distribution Center, located in Hazelwood, MO and located the Subject Parcel, and took note of the excessive tape of all seams. The characteristics listed in this paragraph are consistent with characteristics of previous parcels that have contained narcotics or the proceeds of narcotics. Due to the characteristics associated with the Subject Parcel, I began reviewing USPS, law enforcement, and open source databases to verify the sender/addressee names written on the mailing label for the Subject Parcel.
- 9. The **Subject Parcel** bore a printed label, was sent from a source narcotics area: Fontana, CA (my training and experience has shown Fontana, CA to be a source area for narcotics and destination for narcotics proceeds). The **Subject Parcel** was addressed to "IKYA WILSON P.O. BOX 1510 FLORISSANT, MO 63031 and addressed from: "PREMIUM CLOTHING ETC. 16183 WINTERWOOD LN. FONTANA, CA 92335" A search of the California Secretary of State database revealed no registered corporation or LLC by the name of "Premium Clothing Etc". The return address for the business of Premium Clothing ETC. is single family dwelling, located in a residential area. The printed label displayed a Quick Response Code (QR Code), near the return address. A scan of the QR code directed me to the home page of the internet site "Wikipedia", and bore no relevant shipping or business information. A review of law enforcement databases indicated "Ikya Wilson" did not associate with PO Box 1510 Florissant, MO 63031. Due to the characteristics associated with the Subject Parcel, a K-9 review was requested.
- 10. On February 27th, 2021, Task Force Officer Mason McNail utilized his narcotics certified canine "Tobi." The **Subject Parcel** was placed in an area not known to have been previously contaminated by narcotic odor. TFO McNail directed "Tobi" to search the area. Upon arriving at the

Subject Parcel, canine "Tobi" reacted with an obvious change in behavior, and TFO McNail stated that "Tobi" reacted in a positive manner, indicating the presence of a narcotic odor.

- 11. The **Subject Parcel** is a Priority Mail brown cardboard box. The Subject Parcel measures approximately 11 ½ inches by 8 inches, by 4 ¾ inches and weighs approximately 2 pounds 4 ounces. Based on my training and experience, as well as the training and experience of other members of the USPIS Saint Louis CI2 Team, I know that the size and weight of the **Subject Parcel**, coupled with other indicators (inconsistent information on the label; sender name not associated with sender address; postage fees paid in cash, heavily taped seams, and a positive reaction by a narcotic trained canine), are indicative of other packages which have been found in the past to contain narcotic substances, or monies which are the proceeds/payments of narcotic trafficking. It is my belief that the Subject Parcel contains contraband and/or evidence in violation of Title 21, United States Code, , Sections 841(a)(1) and 846, and Title 18, United States Code, Sections 1952, 1956, and 1957.
- 12. Based upon training and experience, and in consultation with other law enforcement officers and prosecutors, I am aware that individuals engaged in illegal activities (i.e., drug trafficking) that generate significant cash proceeds frequently engage in further criminal activities in order to conceal the source of the cash proceeds. In conjunction with that effort, these individuals avoid banking institutions, which are subject to federal reporting requirements mandating that a written report be made of any transaction involving \$10,000 or more in cash. Wire transfer services (i.e. Western Union and MoneyGram) are also subject to such reporting requirements. In an effort to evade these reporting requirements, individuals engaged in criminal activity seek alternate means (i.e. personal couriers, the United States Mail, and/or private delivery services like FedEx) to transport cash.
- 13. The **Subject Parcel** is currently in the custody of Task Force Officer Bryan J. Bussen in the Eastern District of Missouri. Attached herewith is a picture of the mailing label for Priority Mail parcel 9506115072761056589955 and a copy of the qualifications for canine "Tobi."

14. Because this investigation is ongoing and its success would be jeopardized if the contents of this affidavit were made public, Inspectors request that this affidavit be sealed until further order of the Court.

I state under the penalty of perjury that the foregoing is true and correct.

USPIS Task Force Officer

Sworn to, attested to, and affirmed before me via reliable electronic means pursuant to Federal Rules of Criminal Procedure 4.1 and 41 this 2 of March, 2021.

SHIPLEY P. MENSAH United States Magistrate Judge Eastern District of Missouri Case: 4:21-mj-07052-SPM Doc. #: 1 Filed: 03/02/21 Page: 8 of 9 PageID #: 8

North County Police Cooperative

Bureau of Criminal Investigations Canine Detective Canine Probable Cause Affidavit of Qualifications Handler: Detective Mason McNail, DSN 373 Canine "Tobi"

I, Detective Mason McNail, DSN 464, have been a Commissioned Police Officer with the North County Police Cooperative since January of 2021. I have previously amassed 22 years of police and narcotics experience. I have completed 960 hours of Missouri P.O.S.T. required Law Enforcement Academy requirements. Canine "Tobi" and I are currently assigned to the North County Police Cooperative Bureau of Criminal Investigations, as well as the United States Postal Inspection Service.

Canine Tobi is a brindle colored, male, Dutch Shepherd. He was born on June 10, 2018. Canine Tobi and I attended and completed the "Narcotics Detection," from August 2, 2020 through August 14, 2020. This course was held at F.M. K9, located in Berrien Center, Michigan. The training course consisted of two weeks of instruction in the application of canine obedience, narcotics/controlled substance detection, and article search. Canine Tobi and I were certified by the North American Police Work Dog Association (NAPWDA) as an accredited Narcotic Detection Canine team on August 12, 2020.

Canine Tobi has been trained to sniff and alert to the distinctive odors of controlled substances including: Heroin, Cocaine, Methamphetamine, Fentanyl, and Marijuana. Canine Tobi alerts to these odors in a passive manner and exhibits a significant change in behavior by sitting, standing, or laying at, or as close as he can get, to the source of the odor.

Since Canine Tobi and I began working, he has been responsible for the seizure of approximately 10.5 pounds of marijuana, approximately 24 pounds of methamphetamine, and approximately 2.8 grams of LSD. Canine Tobi has also been responsible for the seizure of approximately \$47,811 in smuggled bulk US Currency.

Canine Tobi and I train a minimum of 16 hours per month, in the areas of narcotic detection, obedience, tracking, and article searches with the St. Louis County Police Department and/or on our own time.

This affidavit is current as of January 12, 2021.

Detective Mason McNail, DSN 373 North County Police Cooperative Bureau of Criminal Investigations 8027 Page St. Louis, MO 314-427-8000 ORIGIN ID: LDRA

PHOM:

PREMIUM CLOTHING ETC. 16183 WINTERWOOD LN. FONTANA, CA 92335

TO

P.O. BOX 1510 FLORISSANT, MO. 63031 SHIP DATE; 25 FEB 2021 ACTWGT: 1 LBS 8 OZS CAD: 1964425828215



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TRK 9788420532318





WHERE STATES.

Retail

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US POSTAGE PAID

\$26.90

Origin: 92335 02/25/21 0527480335-02

PRIORITY MAIL 2-DAY®

2 Lb 4.80 Oz

1025

EXPECTED DELIVERY DAY: 03/01/21

B005

SHIP TO:

PO BOX 1510

Florissant MO 63031-0510

USPS SIGNATURE® TRACKING #



9506 1150 7276 1056 5899 55